

# IN THE 'UNITED STATES' DISTRICT COURT FOR THE DISTRICT OF DELAWARE

CURTIS M. COLLINS  
PLAINTIFF

CIVIL ACTION

\*NO. 105-CV-739 SLR\*

vs.  
RICK KEARNEY ET AL  
DEFENDANTS

13D  
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2006 SEP - 7 10 AM

CLERK U.S. DISTRICT COURT  
DISTRICT OF DELAWARE

MOTION FOR FIRST COPY MEDICAL'S HEALTH SERVICES  
ADMINISTRATOR OF SUSSEX CORRECTIONAL INST (SCI)  
TO PRODUCE THE NAME OF (JANE) DOE, A NURSE WHO IS  
EMPLOYED BY FCM. NURSE JANE DOE, WHO WAS WORKING  
ON 12 TO 8 SHIFT ON AUG 6-05- MID NIGHT SHIFT.  
THE PLAINTIFF REQUESTS THE NAME OF NURSE,  
JANE DOE, SO THAT PLAINTIFF MAY SERVE NAMED  
DEFENDANT JANE DOE IN THE ABOVE CIVIL ACTION  
NO. PURSUANT TO JUDGE SUE ROBINSON'S ORDER SIGNED ON  
7-18-06. THE PLAINTIFF REQUESTS JANE DOE NAME  
TO EFFECT SERVICES OF THE U.S MARSHAL FORM, 285.  
FURTHERMORE, SHOULD THE HEALTH SERVICES ADMIN-  
ISTRATOR AND DR. ROBERTA BURNS REFUSE TO GIVE UP  
NURSE JANE DOE NAME, PLAINTIFF/COLLINS REQUESTS  
CHIEF JUSTICE SUE ROBINSON'S TO ORDER FIRST COPY  
MEDICAL SERVICES, INC. OF 1575 MCKEE RD DOVER DEL  
19904 TO GIVE UP NURSE JANE DOE NAME TO PLAINTIFF  
COLLINS.

AT CURTIS COLLINS  
SBA 314128 DELAWARE CORR/CENTER  
B-203-21-CU-3-  
1181 PADDOCK ROAD SMYRNA DEL  
19977

# \* CERTIFICATE OF SERVICES \*

p2

I CURTIS M. COLLINS hereby CERTIFY THAT I CAUSED A TRUE AND CORRECT COPY OF THE ATTACHED MOTION TO PRODUCE JANE DOE NAME PURSUANT CIVIL ACTION NO. 105 CV 739-SLR- TO BE SERVED ON THE FOLLOWING INDIVIDUALS BY PLACING SAME IN THE UNITED STATE MAIL BY GIVING SAID MAILING TO C/O who is employed AT THE DELAWARE CORRECTION CENTER WHERE I AM CURRENTLY DETAINED ON THIS DAY AUGUST 30, 2006

① ERICA • Y. TROSS ESQ

CEP # 45067  
DEPUTY ATTORNEY GENERAL  
DEPT OF JUSTICE  
CARREL STATE B.I.O.G.  
820 NORTH FRENCH ST  
6TH FLOOR WILMINGTON, DE  
19801

② Peter T. DALLER (clerk)  
UNITED STATES DISTRICT  
COURT DELAWARE  
LOCKBOX 18 #  
844 NORTH KING ST  
WILMINGTON, DE 19801

1535 MCKEE ROAD  
DOVER DELAWARE 19904  
FIRST CORRECTIONAL  
MEDICAL SERVICES

\* Curtis Collins  
CURTIS COLLINS PRO-SE  
# 314128  
DELAWARE CORRECTION CENTER

DATE AUGUST 30, 2006

B.203-21-C-U-3  
1181 Paddock Road  
Smyrna DE 19977

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

PI

CURTIS M. COLLINS  
PLAINTIFF

VS.

ROCK KRAVNEY ET AL  
DEFENDANTS

CIVIL ACTION  
\* NO. 1:05-CV-739 \*  
SLR

NOW COMES THE PLAINTIFF, CURTIS M. COLLINS  
MOTION TO SUBMIT WITNESSES NAMES  
WHO SAW THE BEATING AND THE ATTEMPTED  
MURDER OF PLAINTIFF IN THE ABOVE  
CIVIL ACTION NO: 105-CV-739-SLR

PLAINTIFF COLLINS PRESENTS TO THE COURT  
THE FOLLOWING: PLAINTIFF WITNESS NAMES ARE

- (1) BOBBY PRICE AS OF THIS DATE IS IN Smyrna
- (2) WILLIAM DEVONSHIRE-SBI 193813
- (3) JOHN PALMER SBI 194390

PLAINTIFF HAS OTHER WITNESSES THAT  
COULD BE MADE AVAILABLE SHOULD JUDGE  
SUE ROBINSON SO ORDER

SINCERELY  
Curtis Collins



# CERTIFICATE OF SERVICES

I CURTIS M. COLLINS hereby  
CERTIFY THAT I CAUSE A  
TRUE AND CORRECT COPY OF  
THE ATTACHED MOTION TO  
SUBMIT WITNESSES NAMES by  
GIVEN SADD MAILIN TO A  
OFFICER WHO IS EMPLOYED AT  
THE DELAWARE CORR CENTER WHERE  
I AM CURRANTLY DETAINED ON  
THIS DAY AUG 30, 2006

① PERKA TROSS ESQ  
AD #45062 DEPUTY ATTORNEY  
GENERAL DEPT OF JUSTICE  
CARVEL STATE BLDG  
820 NORTH FRENCH ST  
6TH FLOOR WILM-DEL  
19801

Q CLERK  
PETER T. DALLER  
UNITED STATE DISTRICT  
COURT DELAWARE  
LOCKBOX 18  
844 NORTH KING ST  
WILM/DEL 19801

CURTIS COLLINS  
PRO-SEC SBA 314128  
DEL CORR CENTER  
Bldg 21-C-US-  
1181 Paddock Road  
Smyrna DE

DATE AUG-30-2006

19977

U.S.M.S.  
X-RAY